

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270

525 EAST BAY STREET, SUITE 200
CHARLESTON, SC 29403-6655

Facsimile 843-414-7039

February 13, 2020

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

RE: Rulemaking for the Public Service Commission to Create a New
Regulation 103-811.5 Role of the Qualified, Independent Third-Party
Consultant or Expert and the Commissioners' Reliance on the Contents of
the Qualified, Independent Third-Party Consultant's or Expert's Report

Docket Number 2019-362-A

Dear Ms. Boyd:

The South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE") believe the Commission reasonably interpreted and applied Act 62 as to the role of the independent, qualified expert in the most recent avoided cost proceedings, 2019-184-E, 2019-185-E, and 2019-186-E. If the Commission proceeds with drafting a rule governing the role of the independent, qualified expert in avoided cost proceedings going forward, then language reflecting the approach used in the most recent avoided cost proceedings would be a reasonable approach.

CCL and SACE remain open to reviewing and discussing with interested parties alternative approaches, but submit their current view to the Commission for consideration.

Sincerely,

/s/ J. Blanding Holman, IV
J. Blanding Holman, IV
Southern Environmental Law Center
525 East Bay St
Charleston SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039
*Attorney for South Carolina
Coastal Conservation League and
Southern Alliance for Clean Energy*

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served with a copy of the letter filed on behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy by electronic mail or by deposit in the U.S. Mail, first-class, postage prepaid.

Becky Dover, Counsel
SC Department of Consumer Affairs
bdover@scconsumer.gov

K. Chad Burgess, Counsel
Dominion Energy Southeast Services,
Incorporated
220 Operation Way - MC C222
Cayce, SC 29033
Kenneth.burgess@dominionenergy.com

Carri Grube Lybarker, Counsel
SC Department of Consumer Affairs
clybarker@scconsumer.gov

Katie M. Brown, Counsel
Duke Energy Progress, LLC
40 West Broad Street, Suite 690
Greenville, SC 29601
Katie.Brown2@duke-energy.com

Heather Shirley Smith, Deputy General
Counsel
Duke Energy Carolinas, LLC
40 W. Broad Street, Suite 690
Greenville, SC 29601
heather.smith@duke-energy.com

Matthew W. Gissendanner, Counsel
Dominion Energy Southeast Services,
Incorporated
220 Operation Way - MC C222
Cayce, SC 29033
matthew.gissendanner@dominionenergy.com

James Goldin, Counsel
Nelson Mullins Riley & Scarborough
LLP
1320 Main Street 17th Floor
Columbia, SC 29210
jamey.goldin@nelsonmullins.com

Richard L. Whitt, Counsel
Whitt Law Firm, LLC
Post Office Box 362
401 Western Lane, Suite E
Irmo, SC 29063
richard@rlwhitt.law

Jeffrey M. Nelson, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
jnelson@ors.sc.gov

This 13th day of February, 2020.

s/ Lauren Fry
Lauren Fry